

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 CRIM. 1198

UNITED STATES OF AMERICA

- v. -

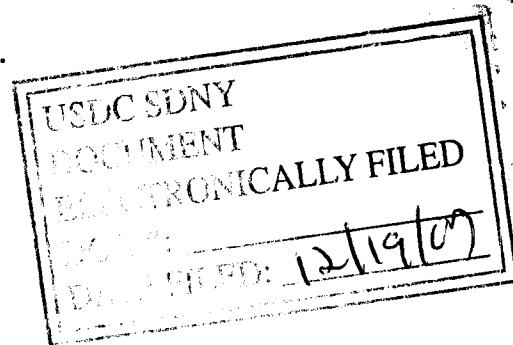
SERGEI SAMSONOV,

Defendant.

SEALED

INDICTMENT

07 Cr.



COUNT ONE

The Grand Jury charges:

1. From at least in or about 2005, up to and including in or about June 2007, in the Southern District of New York and elsewhere, SERGEI SAMSONOV, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1344 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that SERGEI SAMSONOV, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of

false and fraudulent pretenses, representations, and promises, to wit, a scheme to submit to banks loan documents containing false and misleading information for the purpose of procuring loan proceeds, in violation of Title 18, United States Code, Section 1344.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about April 2005, SERGEI SAMSONOV, the defendant, and two co-conspirators not named as defendants herein ("CC-1 and CC-2"), caused WMC Mortgage Corporation to fund mortgage loans in the total amount of \$595,000 for the purchase of a condominium located at 65 Oceana Drive East, #2A, Brooklyn, New York ("65 Oceana Drive").

b. In or about February 2006, SAMSONOV, CC-1 and CC-2 submitted and caused to be submitted to National City Bank loan application documents that contained false and misleading statements in connection with the refinancing of a mortgage loan for 65 Oceana Drive.

c. On or about March 17, 2005, SAMSONOV, CC-1 and CC-2 caused National City Bank to wire approximately \$331,500 in loan proceeds through a bank located in New York, New York.

d. In or about March 2006, SAMSONOV, CC-1 and CC-2 caused New Century Mortgage to fund mortgage loans in the total amount of approximately \$773,760 for the purchase of a condominium located at 40 Oceana Drive West, #9D, Brooklyn, New York ("40 Oceana Drive").

e. In or about December 2006, SAMSONOV, CC-1 and CC-2 submitted and caused to be submitted to National City Bank loan application documents that contained false and misleading statements in connection with the refinancing of a mortgage loan for 40 Oceana Drive.

f. In or about March 2007, SAMSONOV had a conversation with a tenant of a condominium located on Oceana Drive East, in Brooklyn, New York concerning rent payments.

(Title 18, United States Code, Sections 1349.)

COUNT TWO

(Bank Fraud re: 65 Oceana Drive East, #2A, Brooklyn, New York)

The Grand Jury further charges:

4. In on or about February 2006, in the Southern District of New York and elsewhere, SERGEI SAMSONOV, the defendant, unlawfully, willfully, and knowingly did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys,

funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, SAMSONOV submitted, and caused to be submitted, to National City Bank false employment, personal financial and residency information, among other things, in order to procure a loan in the amount of approximately \$331,500 for 65 Oceana Drive East, #2A, Brooklyn, New York, which funds were wired through a bank in New York, New York.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(Bank Fraud re: 40 Oceana Drive West, #9D, Brooklyn, New York)

The Grand Jury further charges:

5. In on or about December 2006, in the Southern District of New York and elsewhere, SERGEI SAMSONOV, the defendant, unlawfully, willfully, and knowingly did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, SAMSONOV submitted, and caused to be submitted,

to National City Bank false employment, personal financial, and residency information, among other things, in order to procure a loan in the amount of approximately \$349,000 for 40 Oceana Drive West, #9D, Brooklyn, New York, which funds were wired through a bank in New York, New York.

(Title 18, United States Code, Sections 1344 and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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SERGEI SAMSONOV,

Defendant.

INDICTMENT

07 Cr.

(Title 18, United States Code,
Section 1344, 1349 and 2)

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL

Armenian Cipher
Foreperson.

12/19/07
- Filed Ind.
Ellis, J.